

Pearson, Matthew A.

From: Ashley, Matt <MAshley@irell.com>
Sent: Tuesday, July 21, 2015 5:54 PM
To: Shiftan, Benjamin E.; Greene, Andra
Cc: Lipanovich, Nathaniel
Subject: RE: L.A. Taxi v. Uber

Sure.

From: Shiftan, Benjamin E. [mailto:bshiftan@pswlaw.com]
Sent: Tuesday, July 21, 2015 5:46 PM
To: Greene, Andra; Ashley, Matt
Cc: Lipanovich, Nathaniel
Subject: RE: L.A. Taxi v. Uber

Thanks. See you tomorrow. Can we also agree—under FRCP 5(b)(2)(E)—that service by e-mail (e.g., for the initial disclosures due tomorrow) constitutes effective service?

Ben

Benjamin E. Shiftan
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From: Greene, Andra [mailto:AGreene@irell.com]
Sent: Tuesday, July 21, 2015 11:17 AM
To: Shiftan, Benjamin E.; Ashley, Matt
Cc: Lipanovich, Nathaniel
Subject: RE: L.A. Taxi v. Uber

Sure

From: Shiftan, Benjamin E. [mailto:bshiftan@pswlaw.com]
Sent: Tuesday, July 21, 2015 11:11 AM
To: Ashley, Matt
Cc: Greene, Andra; Lipanovich, Nathaniel
Subject: RE: L.A. Taxi v. Uber

Sure. Let's meet in the attorney lounge before the hearing. 1:30 work?

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From: Ashley, Matt [<mailto:MAshley@irell.com>]

Sent: Monday, July 20, 2015 6:29 PM

To: Shiftan, Benjamin E.

Cc: Greene, Andra; Lipanovich, Nathaniel

Subject: RE: L.A. Taxi v. Uber

Hi Ben, could we have a quick call tomorrow or perhaps meet a little before Wed's hearing to discuss deposition and rog limits? Shouldn't take very long.

Matt

From: Shiftan, Benjamin E. [<mailto:bshiftan@pswlaw.com>]

Sent: Tuesday, July 14, 2015 11:24 AM

To: Lipanovich, Nathaniel; Ashley, Matt

Cc: Greene, Andra

Subject: RE: L.A. Taxi v. Uber

Thanks, Nat. I've had cases in N.D. Cal. where both the CMC Statement and Joint Report were filed. That said, upon closer look at the Rules, I agree and think that you're right—we've complied with the Rules by just filing the CMC Statement, and there is no need to file a duplicative Joint Report.

Thanks,

Ben

Benjamin E. Shiftan

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From: Lipanovich, Nathaniel [<mailto:NLipanovich@irell.com>]

Sent: Tuesday, July 14, 2015 9:54 AM

To: Shiftan, Benjamin E.; Ashley, Matt

Cc: Greene, Andra

Subject: RE: L.A. Taxi v. Uber

Ben,

The Joint Case Management Statement we filed last week covers the information in the Rule 26 report, and I am not aware of any cases before Judge Tigar where a separate report was filed. In the Northern District of California, it looks

like the Joint Case Management Statement is it, and the parties do not file another report one week before the CMC. If you think otherwise, please let us know.

Nat

From: Shiftan, Benjamin E. [<mailto:bshiftan@pswlaw.com>]
Sent: Tuesday, July 14, 2015 9:29 AM
To: Ashley, Matt; Lipanovich, Nathaniel
Cc: Greene, Andra
Subject: RE: L.A. Taxi v. Uber

Matt:

My calendar shows our Joint Rule 26 report as due tomorrow. I can put together first draft if you'd like. It should be very straightforward and basically just include the same information that went into the CMC statement. Just let me know.

Thanks,

Ben

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From: Ashley, Matt [<mailto:MAshley@irell.com>]
Sent: Monday, July 06, 2015 3:02 PM
To: Shiftan, Benjamin E.; Lipanovich, Nathaniel
Cc: Greene, Andra
Subject: RE: L.A. Taxi v. Uber

Thanks, Ben. We'll work on this and get you a redline draft asap.

From: Shiftan, Benjamin E. [<mailto:bshiftan@pswlaw.com>]
Sent: Monday, July 06, 2015 2:55 PM
To: Ashley, Matt; Lipanovich, Nathaniel
Cc: Greene, Andra
Subject: RE: L.A. Taxi v. Uber

Matt:

See the attached draft shell of the Joint CMC Statement. I'm still thinking through some of the dates/other information I plugged in, and may still modify. I wanted to get you this draft today though so that you could begin plugging in defendant-specific information where appropriate.

Let's plan to talk tomorrow to see if we can get on same page with respect to the dates we are plugging in.

Thanks,

Ben

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From: Ashley, Matt [<mailto:MAshley@irell.com>]
Sent: Monday, June 29, 2015 12:23 PM
To: Shiftan, Benjamin E.; Lipanovich, Nathaniel
Cc: Greene, Andra
Subject: RE: L.A. Taxi v. Uber

Would 10 am Pacific work for you?

From: Shiftan, Benjamin E. [<mailto:bshiftan@pswlaw.com>]
Sent: Monday, June 29, 2015 11:53 AM
To: Ashley, Matt; Lipanovich, Nathaniel
Subject: L.A. Taxi v. Uber

Matt and Nat:

My calendar shows Wednesday as our deadline to conduct our FRCP 26(f) conference. Can we set up a call for Wednesday morning?

Thanks,

Ben

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